

## **REMARKS**

### **Status of Claims**

Claims 1-3, 6, 9, and 12-20 are pending in this application. By this Amendment, claims 1, 6, 9, and 20 have been amended and claims 4, 5, 7, 8, and 10 have been cancelled. Reconsideration of the rejections of all claims is earnestly solicited in view of the above amendments and the following remarks. The Amendments to the claims are fully supported by the specification and do not introduce new matter. The Amendments incorporate the subject matter of cancelled claims 4, 5, 7, 8, and 10 into the independent claims. Entry of this Amendment and timely allowance are requested.

### **Rejection of Claims 1-4, 6-7, 9, and 12-20 under 35 U.S.C. § 103(a)**

Claims 1-4, 6, 7, 9, and 12-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,946,499 to Saunders, in view of U.S. Patent No. 5,511,193 to Tung *et al.* (hereinafter "Tung"). This rejection is respectfully traversed.

Even if combined, Saunders and Tung lack several features of independent claims 1, 6, 9, and 20. As acknowledged in the Office Action, Saunders fails to disclose the tracking mechanism of claim 1. Similarly, Tung also fails to disclose the claimed tracking mechanism.

Both Tung and Saunders disclose the use of a Text Service Manager (TSM) operating between an application and a text service. Saunders provides a method for determining which text service is best equipped for correcting text. Saunders discloses this search process in FIGs. 4A and 4B and the corresponding description. The TSM of Saunders analyzes text and cycles through each available text service in order to determine if the analyzed text should be corrected by a particular text service. As set forth in Column 5, lines 57-60, the order of cycling through the text services is arbitrary. The text in the documents described by Saunders all presumably appears identical, such that it is not evident from the appearance of the text whether the text came from voice recognition software, a tablet, or a keyboard, etc. Thus a determination process such as that described above is necessary to identify the source of the text.

Another focus of Saunders is the invention of a reservation process for use during correction of a document. During correction, each text service is required to reserve a text portion on which it operates using a unique identifier. This reservation is implemented in order to prevent other text services from simultaneously attempting to correct the same portion of text. See Column 6, lines 55-60.

The earlier patent to Tung discloses the details of TSM documents and their uses. In a preferred embodiment of Tung, one TSM document is associated with each working document represented by an application window. The TSM document contains information about input methods and text services used by an instance of an application. Tung discloses methods for creating, activating, deactivating, and disposing of TSM documents and their contents.

Tung's invention allows the TSM to synchronize a current input method to an active window by searching the data structures in the TSM for the input method. The TSM document references a number of open text services 30 in one of its data fields. In order to determine an appropriate input method and text services, Tung uses the input methods 28 and text services 30 associated with each working window and identified in the TSM document 26. See Column 5, line 50 through Column 6, line 37. The structure of the TSM document permits up to four input methods, one per script, to be specified. Thus, four different input methods may be used within the same document. The TSM is capable of detecting a type of text, such as Chinese text, Japanese text or English text and matching the text with an input method stored in the TSM document. By matching a type of text with an input method, Tung synchronizes current text with an appropriate input method. See Column 11, lines 32-57 of Tung. Whereas the disclosure of Saunders includes only one type of text that may be drawn from different types of input devices, the disclosure of Tung includes different types of scripts having a clearly identifiable source based on the appearance of the script.

Thus, not only does Tung fail to disclose a tracking mechanism, Tung also would have no use for a tracking mechanism. The TSM of Tung selects a handler based on a type of script shown in the document, since script in different languages is clearly

identifiable. Tung has no need to track which handler entered the script since the source of the script is evident from the appearance of the script.

In summary, both Tung and Saunders fail to disclose several features of the invention of claim 1. Specifically, both Tung and Saunders fail to disclose any type of tracking mechanism for determining that a specified range of text was entered by a particular handler. Saunders and Tung particularly fail to disclose a mechanism to track initial entry of each specified portion of text into the document by each handler. Furthermore, both Tung and Saunders fail to disclose attaching a property to the range of text in order to track the source of the text. Additionally, Saunders and Tung fail to disclose a correction interface that determines and calls upon the handler initially responsible for entering text as determined by the tracking mechanism to assist in the correction process.

As set forth above, the references, even if combined, fail to disclose each and every feature of the invention independent claim 1. In order to make out a prima facie case of obviousness, the references cited by the Examiner must provide all of the elements of the invention as claimed and a suggestion to combine the disclosures of the various cited art references to make the claimed invention. *In re Geiger*, 815 F.2d 686,688 2 USPQ2d 1276, 1278 (Fed. Cir. 1987); *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984).

Additionally, no motivation would have existed to modify Saunders to include a tracking mechanism. A tracking mechanism such as the claimed tracking mechanism would render the reservation system disclosed by Saunders entirely useless. The reservation system disclosed by Saunders ensures that an event handler will have exclusive uninterrupted access to a segment of text. Accordingly, if a different handler tries to access the text, access will be denied. A tracking system as currently claimed would render the reservation system as well as the cycling system for determining an appropriate handler as disclosed by Saunders, entirely useless.

In order to make a prima facie case of obviousness, a teaching or suggestion of the combination must be found in the prior art. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Also, if a proposed modification would render the prior art

invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).

Accordingly, because the references, even if combined lack several features of claim 1 and furthermore because no teaching or suggestion is present for modifying Saunders to arrive at the invention of claim 1, the references fail to render claim 1 obvious. Claims 2 and 3 depend from claim 1 and define over the art of record for at least the reasons set forth above with respect to claim 1. Claim 4 has been canceled rendering the rejection moot with respect to this claim.

Independent claim 6 is allowable over the art of record for reasons similar to those set forth above with respect to claim 1. Claim 6 defines a machine readable medium having instructions including a mechanism to track initial entry of text into a document owned by an application program by each of a plurality of input device handlers, such that each input device handler is associated with text it enters into the document. The tracking mechanism associates each contiguous range of text to the single handler entering the text and attaches a property to each range of text identifying the single handler. The instructions further include a correction interface callable by the application program after initial text entry to determine a responsible input device handler responsible for initially entering specified text into the document and for calling upon the responsible input device handler to assist in correction of the specified text.

The references lack several features of independent claim 6. The references fail to disclose a mechanism to track initial entry of each specified portion of text into the document by each handler. Additionally, the references fail to disclose a correction interface that determines and calls upon the handler initially responsible for entering text as determined by the tracking mechanism to assist in the correction process. Furthermore, both Tung and Saunders fail to disclose attaching a property to the range of text in order to track the source of the text.

Independent claim 9 defines a computer-implemented method. The method includes entering text into a document owned by an application by a handler for an input device via a common text framework governing interaction between the application and

the handler for the input device, such that the application exposes the document as an abstraction. The method of claim 9 additionally includes tracking of the initial entry of text entered into the document by the handler by the common text framework, including attaching a property to a range of the document corresponding to the text entered, the property identifying the handler for the input device. Claim 9 further defines requesting of the common text framework by the application of an identity of a particular handler that was responsible for initially entering specified text into the document. The method further includes returning to the application the identity of the particular handler that was responsible for initially entering the specified text into the document and requesting of correction information from the particular handler.

As set forth above, the references fail to disclose the step of tracking the initial entry of text into a document by a handler, including attaching a property to a range of the document corresponding to the text entered, the property identifying the handler for the input device. The references further fail to disclose or teach ascertaining the identity of the particular handler that was responsible for the initial entry based on the tracking information. Finally, the references also fail to disclose or teach requesting correction information from the particular handler responsible for the initial entry of text.

Accordingly, the references fail to render obvious independent claim 9. Claims 12-19 depend from claim 9 and are allowable over the art of record for at least the reasons set forth above.

The references fail to disclose or teach several features of independent claim 20. As set forth above, the references fail to disclose at least the features of tracking text during initial text processing and requesting an identity of the particular handler entering the text, wherein tracking of the text includes associating each contiguous range of text entered into the document by a single handler to the single handler and attaching a property to each contiguous range of text identifying the single handler for the contiguous range of text. The references further fail to teach or disclose returning the identity of the handler that was responsible for entering the specified text and requesting that the particular handler assist with correction. Because the references fail to disclose or teach

at least the above-identified features of claim 20, the references fail to render obvious claim 20.

Claims 4, 7, and 11 have been canceled and the references fail to teach or disclose each and every feature of claims 1-3, 6, 9, and 12-20 as set forth above. Accordingly, withdrawal of the rejection of claims 1-4, 6, 7, 9, and 11-20 under 35 U.S.C. §103 (a) is respectfully requested.

**Rejection of Claims 5, 8, and 10 under 35 U.S.C. § 103(a)**

Claims 5, 8, and 10 have been rejected under 35 U.S.C. § 103(a) over Saunders and Tung and in further view of U.S. Patent No. 5,524,193 to Covington et al. (hereinafter "Covington"). Claims 5, 8, and 10 have been cancelled and their subject matter has been incorporated into their respective independent claims. This rejection is respectfully traversed as it may be applied to the amended claims.

As Covington might be applied to independent claims 1, 6, 13, and 20, the rejection is respectfully traversed. Covington fails to obviate the deficiencies of Saunders and Tung noted above. Furthermore, Covington fails to show attaching a property to text for tracking purposes as alleged in the Office Action. Covington merely discloses the association of particular words or phrases with multimedia events.

**CONCLUSION**

Claims 1-3, 6, 9, and 12-20 are pending in this application. In view of the amendments and remarks, applicants respectfully request that this application be allowed and passed to issue. Should any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned prior to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112 referencing Attorney Docket No. MFCP.87509.

Respectfully submitted,

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